

9:25 am August 14, 2020

KOH: USAO 2020R00534

AT GREENBELT
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY TTS, DEPUTY CLERK**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND****UNITED STATES OF AMERICA****v.****SHAYKH ABDUL-MAJID,****Defendant****CASE NO. 20-mj-2056-TJS**

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

I, Special Agent Lindsay M. Keeler, being dully sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. This affidavit is made in support of a criminal complaint and arrest warrant for **SHAYKH ABDUL-MAJID** (“**ABDUL-MAJID**”) for committing, in the District of Maryland, violations of interference with commerce by robbery, in violation of 18 U.S.C. § 1951, and discharge, brandish, use, carrying, and possession of a firearm during and in relation to any crime of violence, in violation of 18 U.S.C. § 924(c).

2. I am a Special Agent with the Federal Bureau of Investigation (“FBI”), and have been since July 2019. Your affiant is currently assigned to the FBI Cross Border Task Force, Cheverly, Maryland, comprised of FBI Special Agents, Intelligence Analysts, and Detectives from Prince George’s County Police Department (“PGPD”). Your affiant has participated in several investigations focused on violent crimes, to include, commercial armed robberies, homicides and kidnappings. In my capacity as a Special Agent of the FBI, I am authorized to obtain and serve federal search warrants.

3. The statements made in this affidavit are based in part on: (a) my personal participation in this investigation; (b) information provided to me by the other law enforcement officers; (c) the

training and experience of myself and other law enforcement agents and officers. Because this Affidavit is offered for the limited purpose of establishing probable cause to support the criminal complaint and arrest warrant, it contains only a summary of relevant facts and I have not included all of the information relevant to the investigation in this affidavit. To the best of my knowledge and belief, all statements made in this affidavit are true and correct.

PROBABLE CAUSE

4. On June 29, 2020 at approximately 4:43 pm, officers with PGPD responded to a report of a commercial armed robbery at Business 1, located in District Heights, Maryland. The victims advised the Subject entered the store and pointed a silver and black handgun at them. The Subject demanded money from the registers and phones from the store's display case from Victim 1 and Victim 2, who were both employees of Business 1. Victim 1 and Victim 2 complied with the demands, giving the subject approximately \$500 in store funds and ten cellular phones with a total approximate value of \$7,400. The Subject then demanded a wallet from Victim 3, a Business 1 customer. Victim 3 complied and gave the subject his wallet containing personal documents to include, bank cards, credit cards, a driver's license, a social security card and approximately \$50.

5. The Subject was a black male, approximately 30-35 years old with a light complexion, long black dreadlocks and thin build. He was wearing an orange sweatshirt with a black stripe and "Kappa" clothing logo down the sleeves, dark blue jeans, black surgical mask, clear plastic gloves, olive-colored ball cap with black bill, and black Nike sneakers. Minutes prior to the robbery, video surveillance shows the Subject walking towards Business 1 from the direction of Addison Avenue in District Heights, Maryland. A witness, who resides on Addison Avenue, described seeing an individual, who matched the Subject's description, park in front of his house in a champagne-colored sport utility vehicle and exit on foot. The witness saw the same individual run from the direction of Business 1 and

get back into the vehicle a short time later. During the course of the investigation, the vehicle was identified as a 2001-2004 champagne-colored Mitsubishi Montero Sport with a unique round window decal on the rear driver side window.

6. On July 4, 2020 at approximately 6:47 pm, PGPD officers responded to a report of a commercial armed robbery at Business 2, located in District Heights, Maryland. Victim 4 and Victim 5, both employees at Business 2, advised the Subject entered the store by jumping through the drive-thru window and pointed a silver and black handgun at Victim 4 and Victim 5. The Subject demanded money from the store's register and the victims complied, giving him approximately \$2,000.

7. The Subject was a black male, approximately 20-35 years old with a light complexion, long black dreadlocks and a thin build. He was wearing an orange sweatshirt with a black stripe and "Kappa" clothing logo down the sleeves, red sweatpants with the "Kappa" clothing logo down the sides, black-colored ball cap with "SLANE" stitched above the bill in white, black surgical mask, orange/red work gloves, white socks, and black sandals. The Subject fled on foot from the store towards Camp Street.

8. Approximately four minutes prior to the robbery, video surveillance showed a champagne-colored 2001-2004 Mitsubishi Montero Sport, with a unique round window decal on the rear driver side window, drive onto Camp Street. Video surveillance also showed the Subject approached Business 2 from Camp Street and fled back towards Camp Street following the robbery.



A photo of the window decal on the Mitsubishi Montero Sport

9. On July 5, 2020 at approximately 10:11 am, PGPD officers responded to a report of a commercial armed robbery and non-contact shooting at Business 3, located in Kettering, Maryland. Officers met with Victim 6, an employee of Business 3, who was transported to Bowie Heath Center for lacerations to his left hand and fingers. Interviews and surveillance footage revealed that the Subject entered the store posing as a customer. The Subject then produced a silver and black handgun, pointed it at Victim 6, and demanded funds from the store. Victim 6 complied and gave the Subject \$200 in store funds. The Subject then demanded Victim 6 move to the store's back storage area and Victim 6 complied. Victim 6, fearing he would be shot, attempted to remove the handgun from the Subject. The Subject fired two rounds during the struggle, neither striking Victim 6. The Victim's hand and fingers were cut as he tried to prevent the handgun's slide from racking as casings were ejecting. After the struggle, the Subject fled on foot out the back of Business 3 with the store funds.

10. The Subject was a black male, approximately 20-35 years old with a light complexion, long black dreadlocks and thin build. He was wearing an orange sweatshirt with a black stripe and “Kappa” clothing logo down the sleeves, red sweatpants with the “Kappa” clothing logo down the sides, black-colored ball cap with “SLANE” stitched above the bill in white, light-colored surgical mask, orange/red work gloves, white socks, and black sandals with a white circular design.

11. Further investigation revealed that on June 3, 2020, a Mitsubishi Montero Sport bearing Washington, DC registration plate ENV2337 (“the Mitsubishi”) was involved in a police incident in Washington, DC. Historical license plate reader (“LPR”) photographs were reviewed for Washington, DC registration plate ENV2337. The photographs revealed the vehicle’s make, model, color and circular decal displayed on the rear driver’s side window were consistent with the Subject’s vehicle seen in the vicinity of the commercial armed robberies at Business 1 and Business 2.

12. On July 7, 2020, detectives located the Mitsubishi parked in Washington, DC. The vehicle was occupied by **ABDUL-MAJID**. Upon seeing law enforcement, **ABDUL-MAJID** fled from the vehicle on foot, but was apprehended a short time later. **ABDUL-MAJID**’s race, sex, age, complexion and hair style are all consistent with descriptions and images captured of the Subject during the robberies of Business 1, Business 2, and Business 3. Law enforcement officers seized the Mitsubishi and obtained a search warrant authorized by the Honorable ShaRon M. Grayson Kelsey, Associate Judge, Circuit Court for Prince George’s County, Maryland, which was later executed on the vehicle. During the search of the Mitsubishi, officers recovered a black-colored ball cap with “SLANE” stitched above the bill in white and a red glove, both consistent with the items worn by the Subject in the Business 2 and Business 3 robberies. Officers also recovered a silver and black handgun, consistent with the weapon used by the Subject in the Business 1, Business 2 and Business 3 robberies.

CONCLUSION

13. Based on the foregoing facts, I believe probable cause exists to support the issuance of a criminal complaint and arrest warrant charging **SHAYKH ABDUL-MAJID** with violations of interference with commerce by robbery, in violation of 18 U.S.C. § 1951, and discharge, brandish, use, carrying, and possession of a firearm during and in relation to any crime of violence, in violation of 18 U.S.C. § 924(c).

SA Lindsay Keeler

Lindsay M. Keeler
Special Agent
Federal Bureau of Investigation

Affidavit submitted by email and attested to me as true and accurate by telephone consistent with Fed. R. Crim. P. 4.1 and 41(d)(3) this 13th day of August, 2020.

[Signature]

Honorable Timothy J. Sullivan
United States Magistrate Judge